

Before the
Federal Communications Commission
Washington, D.C. 20554
FCC Docket No. 93-136
PR Docket No. 93-59

JUN 14 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
JUN 14 1993

In the Matter of) FCC Docket No. 93-136
Amendment of the Commission's) ET Docket No. 93-59
Rules to allocate 449 Mhz)
for wind profiler systems.)

June 12, 1993

To: The Federal Communications Commission

COMMENTS OF THE TECHNOLOGY RADIO AMATEUR CLUB

- 1 These comments are submitted by the TEchnology Radio Amateur Club, (TERAC). TERAC is located in Beaverton OR, a major technology oriented metropolitan area. TERAC is the prime responder for Washington CO. Emergency Management, is affiliated with the Oregon Trail Chapter of the Red Cross Emergency Services, and supports numerous public service events, such as Artquake, with safety and emergency communications. TERAC members are also very active in experinemtation with applications of microwave communications and with new technonogies.

- 2 **Meteorological aids proposed for inappropriate spectrum**

TERAC opposes this allocation. The proposed allocation of spectrum is to be used by meteorological aids in a frequency segment allocated to radiolocation. Wind profiler devices would be more appropriately located in frequency segments allocated for meteorological aids. We believe that the proposed allocation is an inappropriate use of shared spectrum.

- 3 **Non-government expansion objectionable**

We strenuously object to the expansion contained in this docket which would include reallocation of spectrum to new non-government meteorological aids. Further we oppose such an allocation in the shared radiolocation spectrum at 915 MHz. The proposed expansion creates a new user of spectrum while providing no accommodation for the existing sharing partners of the segment.

- 4 **Need for 400 MHz systems questioned**

We note that, if as asserted by the Radian Corporation, Inc petition, 449 MHz systems provide insufficient resolution at low altitudes, then some doubt is cast upon the effectiveness and need for such 449 MHz systems. We believe a more suitable approach would be to find more appropriate meteorological aid spectrum for profiler

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5 Active bands disrupted

Further, we note that both of the proposed bands, 449 MHz and 915 MHz are very active and busy bands. Imposing the burden of an additional service on these bands will diminish the useability of the bands.

6 Technical protection not supported in the docket

Amateur Radio Service (ARS) frequency coordinators and repeater operators who are most affected by the proposals of this docket were not consulted during discussions on this matter. However, we understand that in discussion between the ARRL and the NTIA, commitments were made to protect ARS repeaters by the use of beam tilt, shielding and other technical means. Although we oppose this reallocation, we also feel that, should this docket be adopted, these commitments should be reflected in the service rules for wind profiler systems.

7 Frequency Coordinator resource overlooked

We note that the proposed docket would require notification of repeater operators listed in